

**FILED**  
6/22/2021

CL

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MATTHEW SCHWARTZ

No. **21CR**

**316**

Violations: Title 18, United States  
Code, Section 875(c); Title 18, United  
States Code, Section 2261A(2)(B)

**Presiding Judge Wood**  
**Magistrate Judge Weisman**  
COUNT ONE

The SPECIAL MAY 2021 GRAND JURY charges:

From in or around March 2020 to in or around May 2021, at Inverness, in the  
Northern District of Illinois, Eastern Division, and elsewhere,

MATTHEW SCHWARTZ,

defendant herein, did knowingly, with intent to harass and intimidate another  
person, namely, Individual A, did use an interactive computer service, an electronic  
communication service, an electronic communication system of interstate commerce,  
and other facilities of interstate and foreign commerce, namely, the internet, a  
cellular telephone, text messages, and the Burner application, to engage in a course  
of conduct that caused, attempted to cause, and would be reasonably expected to  
cause substantial emotional distress to Individual A;

In violation of Title 18, United States Code, Section 2261A(2)(B).

**COUNT TWO**

The SPECIAL MAY 2021 GRAND JURY further charges:

On or about May 31, 2020, at Inverness, in the Northern District of Illinois, Eastern Division, and elsewhere,

MATTHEW SCHWARTZ,

defendant herein, did knowingly and willfully transmit in interstate commerce a communication containing a threat to injure the person of another;

In violation of Title 18, United States Code, Section 875(c).

**COUNT THREE**

The SPECIAL MAY 2021 GRAND JURY further charges:

On or about November 3, 2020, at Inverness, in the Northern District of Illinois, Eastern Division, and elsewhere,

MATTHEW SCHWARTZ,

defendant herein, did knowingly and willfully transmit in interstate commerce a communication containing a threat to injure the person of another;

In violation of Title 18, United States Code, Section 875(c).

**COUNT FOUR**

The SPECIAL MAY 2021 GRAND JURY further charges:

On or about November 27, 2020, at Inverness, in the Northern District of Illinois, Eastern Division, and elsewhere,

MATTHEW SCHWARTZ,

defendant herein, did knowingly and willfully transmit in interstate commerce a communication containing a threat to injure the person of another;

In violation of Title 18, United States Code, Section 875(c).

A TRUE BILL:

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FOREPERSON

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Signed by Erika Csicsila on behalf of the  
UNITED STATES ATTORNEY